

Eric L. Cramer (*Pro Hac Vice*)  
Michael Dell'Angelo (*Pro Hac Vice*)  
Patrick F. Madden (*Pro Hac Vice*)  
Mark R. Suter (*Pro Hac Vice*)  
BERGER MONTAGUE PC  
1818 Market Street, Suite 3600  
Philadelphia, PA 19103  
Telephone: (215) 875-3000  
Facsimile: (215) 875-4604  
ecramer@bm.net  
mdellangelo@bm.net  
pmadden@bm.net  
msuter@bm.net

*Co-Lead Counsel for the Classes and  
Attorneys for Individual and Representative Plaintiffs  
Cung Le, Nathan Quarry, Jon Fitch, Luis Javier  
Vazquez, Brandon Vera, and Kyle Kingsbury*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

Cung Le, Nathan Quarry, Jon Fitch, Brandon  
Vera, Luis Javier Vazquez, and Kyle Kingsbury  
on behalf of themselves and all others similarly  
situated,

Plaintiffs,  
v.

Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045-RFB-BNW

**DECLARATION OF PATRICK F.  
MADDEN, ESQ.**

1 I, Patrick F. Madden, Esq., declare and state as follows:

2 1. I am an associate at Berger Montague PC, one of the Court appointed Interim Co-Lead  
3 Counsel for the proposed Classes and an attorney for Individual and Representative Plaintiffs. I  
4 am a member in good standing of the State Bar of Pennsylvania and have been admitted *pro hac*  
5 *vice* in this Court. I am over 18 years of age and have personal knowledge of the facts stated in  
6 this Declaration. If called as a witness, I could and would testify competently to them.

7 2. I make this declaration in support of Plaintiffs' Opposition to Defendant Zuffa, LLC's  
8 Motion to Seal Exhibits and Protected Materials at the Evidentiary Hearing on Class  
9 Certification.

10 3. Attached as Exhibit 1 is a true and correct copy of a letter from Jonathan M. Shaw to Eric  
11 L. Cramer dated May 24, 2019.

12 4. Attached as Exhibit 2 is a true and correct copy of the Expert Report of Hal J. Singer,  
13 Ph.D., dated August 31, 2017, with Zuffa's proposed redactions.

14 5. Attached as Exhibit 3 is a true and correct copy of the Rebuttal Expert Report of Hal J.  
15 Singer, Ph.D., dated January 12, 2018, with Zuffa's proposed redactions.

16 6. Attached as Exhibit 4 is a true and correct copy of the Supplemental Expert Report of Hal  
17 J. Singer, Ph.D., dated April 3, 2018, with Zuffa's proposed redactions.

18 7. Attached as Exhibit 5 is a true and correct copy of the Second Supplemental Reply Report  
19 of Hal J. Singer, Ph.D., dated May 28, 2018, with Zuffa's proposed redactions.

20 8. Attached as Exhibit 6 is a true and correct copy of the Expert Report of Professor Robert  
21 H. Topel, dated October 27, 2017, with Zuffa's proposed redactions.

22 9. Attached as Exhibit 7 is a true and correct copy of a document bearing the Bates label  
23 MDYS ZFF 000082 through MDYS ZFF 000087. This document was produced by Moody's  
24 Investors Service, Inc. to Plaintiffs in discovery. This document is a true and correct copy of a  
25 credit opinion prepared for Zuffa by Moody's Investors Service, Inc. in February 2016.

26 10. Attached as Exhibit 8 is a true and correct copy of excerpts from the Form S-1  
27 Registration Statement of Endeavor Group Holdings, Inc., dated May 23, 2019. This document  
28

1 can be accessed at [https://www.sec.gov/Archives/edgar/data/1766363/000119312519155034/](https://www.sec.gov/Archives/edgar/data/1766363/000119312519155034/d681105ds1.htm)  
2 d681105ds1.htm.

3 11. Attached as Exhibit 9 is a true and correct copy of a document bearing the Bates label  
4 ZFL-0895314 through ZFL-0895317. This document was produced by Zuffa to Plaintiffs in  
5 discovery. This document is a true and correct copy of a Zuffa presentation entitled "Minimum  
6 Fighter Pay," dated January 2015.

7 12. Attached as Exhibit 10 is a true and correct copy of Professor Robert H. Topel's Reply to  
8 the Supplemental Expert Report of Hal J. Singer, Ph.D, dated May 7, 2018, ECF No. 551-16.

9  
10 I declare under penalty of perjury and the laws of the United States that the foregoing is  
11 true and correct. This Declaration was executed in Philadelphia, Pennsylvania on June 28, 2019.

12  
13 /s/ Patrick F. Madden

14 Patrick F. Madden  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28